

In response to Applicants previous arguments regarding the routing capabilities of Schutzer, the Office Action states that “the document server receives the billing data from the billing service provider and delivers such billing data to the customer service provider (see column 9, lines 24-35).” Although this characterization may be true with respect to some embodiments disclosed in Schutzer, Applicants’ respectfully disagree that any portion of Schutzer reads on or even suggests the present invention as recited in the independent claims of the present application.

Each of the independent claims explicitly requires (in the billing embodiment of the present invention) a single electronic account exchange system that routes bills and settlement information between multiple billing service providers (BSPs) and multiple customer service providers (CSPs). Schutzer does not anywhere describe where one of its commerce document servers is able to route bills from multiple BSPs to multiple CSPs as is explicitly required by each of the independent claims.

The embodiment illustrated in Figure 1 of Schutzer, shows a commerce document Server 108 connected between a *single* BSP 104 and a *single* CSP 102. The embodiments illustrated in Figures 2, 5 and 6, do not even show the commerce document server as being interposed between the BSP 104 and the CSP 102. The embodiment of the commerce document server illustrated in Figure 3 is interposed between a *single* BSP and multiple CSPs 102. In the Figure 4 version of the commerce document server, it is interposed between a *single* CSP 102 and multiple BSPs 104. To repeat, no where in Schutzer is a commerce document server described that interconnects and can route bills among multiple billing service providers and multiple consumer service providers as is explicitly required by all of the claims of the present invention. Furthermore, no design of Schutzer’s commerce document server appears capable of being altered to support multiple parties on both sides of the server as is required by the present invention.

As Applicants best understand the system disclosed in Schutzer (which was very difficult) the commerce document server 108 is a module that can be owned and operated by a single BSP through which it can communicate with multiple CSPs (as illustrated in Figure 3), or can be owned and operated by a single CSP through which it can communicate with multiple BSPs (as illustrated in Figure 4).

In regard to the citation in the final Office Action to column 9, lines 24-35, Applicants respectfully submit that this portion of Schutzer merely supports its only disclosed embodiments in which the commerce document server is a module which can be owned and operated by individual BSPs or individual CSPs. For example, at column 8, lines 4-9 Schutzer states that “[t]he commerce document server may be distributed and independently managed by cooperating bill and consumer service providers. For example, each bill service provider and each customer service provider may maintain its own system on behalf of its customers.” At column 9, lines 15-18, it is stated that “[t]he consumer service provider may contract with multiple commerce document servers, but only one is typical and the customer service provider typically services many customers.” If the commerce document server of Schutzer supported the design of the exchange server of the present invention, a CSP would never have to “contract with multiple” servers, as the single exchange server of the present invention is capable of connecting the CSP to every BSP.

At column 13, lines 34-37, Schutzer states that “[b]ills for the consumer 100 are stored and forwarded to the consumer’s electronic mailbox hosted on the commerce document server 108, which may be the consumer provider’s smart server.” These mailboxes (for the consumer, for the BSPs and for the CSPs) appear to be the only way in which the commerce document servers is able to satisfy the bill delivery recitation of column 9, lines 24-35. As described throughout the Schutzer specification, these mailboxes are only described as residing on servers owned and operated by the BSPs or the CSPs. For example, as illustrated in Figure 7 of Schutzer, the mailbox server 148 is shown as being part of the BSP and the

mailbox server 150 is illustrated as part of CSP 102.

It is clear throughout Schutzer's specification that its preferred embodiment (as previously argued) is one in which the BSPs and the CSPs speak directly. In the embodiments in which its systems and methods use the commerce document server interposed between a billing service provider and a customer service provider (to provide mailbox services), the commerce document server can be accessed by a *single* BSP and multiple CSPs or alternatively a *single* CSP and multiple BSPs.

In contrast to the system and method as recited in Schutzer, the present invention as recited in each of the independent claims explicitly requires that a single exchange server is able to route information between multiple information providers (e.g., BSPs) and multiple information receivers (e.g., CSPs). This feature of the present invention is neither taught nor suggested by Schutzer. As Applicants have shown, Schutzer only describes embodiments that connects a single party with multiple parties, not multiple parties to multiple parties. Accordingly, Schutzer does not render unpatentable the claims of the present application, and withdrawal of the final Office Action is respectfully requested. As each of the claims of the present application are currently in condition for allowance, such action is earnestly solicited.

Dated: October 1, 2002

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Dated: October 1, 2002

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